

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
Phone (303) 692-2000
TDD Line (303) 691-7700
Located in Glendale, Colorado

Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

February 26, 2002

Joseph A. Legare, Assistant Manager
Environment & Stewardship
U.S. Department of Energy, RFFO
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

Stephen Nesta, Environmental Manager
Remediation, Industrial D&D, & Site Services
Kaiser-Hill Company, L.L.C.
10808 Highway 93, Unit B, Building 116
Golden, Colorado 80403-8200

RE: Approval of Closure Description Document for Closure of RCRA Tank T-207 (also known as T-29) at the Rocky Flats Environmental Technology Site (RFETS)

Dear Mr. Nesta and Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has received your notice of intent to partially close RCRA Tank 207 and has reviewed the *Closure Description Document (CDD) for RCRA Removal of Tank 207*. This CDD was originally received by the Division on or about March 1, 2001 with a cover letter signed on February 22, 2001. On October 19, 2001, the Division received your letter dated October 11, 2001 requesting to withdraw the *Closure Description Document (CDD) for RCRA Removal of Tank 207*. On January 11, 2001, James Hindman of the Division received an e-mail from Mr. Nesta with an electronic revised version of the *Closure Description Document (CDD) for RCRA Removal of Tank 207*. Mr. Nesta's e-mail message requested approval of the revised CDD and stated that the message supercedes the October 11, 2001 letter. This CDD applies to Tank 207, which is a 200,000-gallon carbon-steel above ground storage tank located outside the northeast corner of Building 776/777 and is west of the Solar Ponds. As stated in the CDD, Tank 207 is also known as Tank T-29 and was part of the original process waste line (OPWL) system and part of Operable Unit 9.

The components of the RCRA unit described by this CDD will be closed by the method described as "Unit Removal" in Section X (Closure Plan) of the RFETS RCRA Permit No. CO-97-05-30-01. In accordance with Permit Condition X.B.3 of the RFETS RCRA Permit No. CO-97-05-30-01, the Division hereby approves this CDD (as revised via the January 11, 2002 e-mail) for RCRA Tank 207 as described therein, with the following conditions:

ADMIN RECORD

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- For clarification purposes in response to language in Section 4.1 of the CDD, portions of the unit that have come into contact with listed hazardous/mixed wastes must continue to carry the listed hazardous waste codes unless appropriately decontaminated. Appropriate decontamination may be conducted according to the clean closure performance standard in the approved closure plan or the waste debris may be treated according to the Alternative Treatment Standards for Hazardous Debris per Section 268.45 of the Colorado Hazardous Waste Regulations (6 CCR 1007-3). For Tank 207, the results of radiological surveys do not affect the hazardous waste portion of the characterization of the waste.
- During the closure process, the bottom of the tank must be visually inspected for the presence of any holes. If holes are found, then the soil beneath the hole must be sampled and analyzed for the suite of hazardous constituents that were managed in Tank 207.
- Section 6.0, "Soil Contamination Evaluation and Post Closure Care" appears to incorrectly summarize analytical data collected from OU 9 Phase I RFI/RI surface soil samples and borehole soil samples collected around the tank. For the surface soil samples, Section 6.0 states, "Methylene Chloride was the only organic detected above 1.0 microgram per kilogram ($\mu\text{g/kg}$).\" This statement should be revised since several other organic compounds were detected above 1 $\mu\text{g/kg}$ in the two surface soil samples.

Additionally, because the CDD refers to the Integrated Work Control Package (IWCP)/engineering work package for significant details regarding the dismantlement and size reduction activities for Tank 207, the Division requests that the IWCP/engineering package be provided to the Division for review at least seven calendar days prior to the start of work covered by the CDD. In accordance with 6 CCR 1007-3, Section 264.113(b) and Permit Condition X.B.4.b, RFETS must complete the required closure activities identified in the approved CDD for Tank 207 within 180 days after the approval date of February 26, 2002. If you have any questions concerning these matters, please contact James Hindman at (303) 692-3345.

Sincerely,



Joe Schieffelin, Unit Leader
Hazardous Waste Compliance Unit

cc: S. MacLeod, DOE-RFFO
S. Tower, DOE-RFFO
D. Shelton, Kaiser-Hill
M. Aguilar, USEPA Region VIII
T. Rehder, USEPA Region VIII

D. Miller, AGO
S. Gunderson, CDPHE-HMWMD
D. Kruchek, CDPHE-HMWMD
S. Tarlton, CDPHE-HMWMD
Administrative Records, RFETS Bldg. 850

